

John Daly  
09/23/2022

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DONNA POPLAR,

Plaintiff,

vs.

Case No. 4:21-cv-12568

Hon. Victoria A. Roberts

GENESEE COUNTY ROAD

COMMISSION and FRED F.

PEIVANDI, in his individual

capacity,

Defendants.

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The Deposition of JOHN DALY,

Taken at Hanson Remote,

Commencing at 8:43 a.m.,

Friday, September 23, 2022,

Before Tamora L. Thompson, CSR-5378.

Attorneys, Court Reporter & Witness appearing remotely.

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1 A. Throughout that period of time, I was the managing  
2 director. Additionally for three years, I also served  
3 as the HR Director. And for the last seven years, I  
4 believe, I was the Director of IT as well.

5 Q. When you were director of IT, were you also the managing  
6 director or --

7 A. I held the managing director position continuously from  
8 1999 until 201.

9 Q. Okay. Perfect. Then while you were the managing  
10 director, during this time, did all directors report  
11 directly to you?

12 A. Yes.

13 Q. Who were the directors that reported to you at that  
14 time? I would just say really within the -- since 2016.

15 A. Are you asking me the position or the person?

16 Q. The position and the person, if you can remember.

17 A. Let's see, first was during that period of time Rocky  
18 Davis and Anthony Branch served as director of  
19 maintenance. Randy Dellaposta served as director of  
20 freight maintenance at the facilities. Kermit Pitts,  
21 McKinney Jackson and Donna Poplar served as director of  
22 HR. My finance director was Lynn Luellen, and I can't  
23 remember her name right now. She is director of -- down  
24 at the Oakland County Road Commission now.

25 Q. Okay.

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1 A. Then Coetta Adams took that position. Let's see,  
2 Director of Engineering (inaudible) the first and he was  
3 only there for about ten months, or about two years  
4 while I was there. Then Fred Peivandi became the  
5 Director of Engineering. I think that's all the  
6 directors that reported directly to me.

7 Q. Thank you. I am going to stop my video because I'm  
8 having a little cut in and out. I don't want my  
9 bandwidth to prevent me from hearing what you have to  
10 say. I'll just stop and see if that makes it better.  
11 Thank you for your response.

12 So during that time that you were managing  
13 director, Donna Poplar reported to you, and you say that  
14 she was the Human Resources Director. Did you hire  
15 Donna directly?

16 A. I did.

17 Q. When you hired Ms. Poplar, did she disclose, to you, at  
18 any time during the interview process or when she was  
19 hired, that she had a visual disability?

20 A. She did.

21 Q. When she disclosed that she had a visual disability to  
22 you, did she also ask for accommodations for her  
23 disability?

24 A. She disclosed the disability, to me, during the final  
25 meeting before I made the offer to hire her.

1 Q. In the interview process, she disclosed she had a vision  
2 disability?

3 A. Right. And she said that her vision was deteriorating.  
4 If I recall, her vision was deteriorating and that  
5 she -- so I was not surprised about three months later  
6 initially when (inaudible) it was the outside of the  
7 fence next to the building. And so she indicated that  
8 she was having some difficulties seeing where the fence  
9 was because it's a hurricane type fence that you could  
10 see through.

11 So she asked for a parking spot because of her  
12 disabled vision that was closer to the building. So I  
13 accommodated that and assigned her a parking spot that  
14 was two or three spots down from mine. Then she did ask  
15 for the addition of an another employee to HR, and that  
16 was initially made as that, first of all, that position  
17 had been there when I came in. Just been gapped for  
18 several years.

19 She asked if we could fill that position. And  
20 I indicated, to her, that if -- I inquired as to why.  
21 Initially it was because of the -- there was an  
22 increased workload due to the legal changes were taking  
23 place with regards to OPED that were mandated by the  
24 state additional reporting requirements and record  
25 keeping that was required. And I was aware of that

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1 because that was right at the end of the period that I  
2 had just served as HR director.

3 So then in the discussions subsequent to that,  
4 I would say a month or so later, she indicated that,  
5 again, her vision was deteriorating and she needed  
6 assistance. That if this person were to be hired, they  
7 would be able to help her with things like even reading  
8 some of the documents.

9 Q. And did you find that that was a reasonable request?

10 A. That was a reasonable request?

11 Q. Yes. For accommodation.

12 A. For accommodation.

13 Q. Yes, for her vision.

14 A. Before it had been gapped. My intent, from my  
15 experience, is that I had -- there was the HR director,  
16 that position was (inaudible).

17 (Answer incomplete because of  
18 Zoom technical issues.)

19 Q. Ask you the question again.

20 So I asked you previously, was it a reasonable  
21 -- was Donna's request for accommodation reasonable for  
22 the HR assistance?

23 A. Yes.

24 Q. And then you stated that the position was a position  
25 that had been previously budgeted and not filled,



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1 correct?  
2 A. No. You've got to remember, we are talking about a span  
3 of between seven or eight years between the time that I  
4 was hired and when I came in as manager and director and  
5 when I was HR director. When I came in as HR director,  
6 there were four people in the HR department. There were  
7 the director, and then three assistants. One of those  
8 assistants retired immediately after I got to the Road  
9 Commission, not immediately, about a year, and that  
10 position was nerve filled.  
11 Q. Okay. So I want to go back to a line of questioning  
12 from earlier.  
13 You stated that as the position for the HR  
14 administrative assistant developed, Ms. Poplar requested  
15 accommodations and she asked that this employee be able  
16 to assist her with reading. Do you know any other tasks  
17 that this HR administrative assistant was supposed to  
18 assist Ms. Poplar with?  
19 A. Well, I believe in keeping in both the taking of records  
20 and the reading of records, but that's what I recall was  
21 that position was going to be necessary. First of all,  
22 it was necessary whether, in my opinion, whether  
23 Ms. Poplar was there or not because of the increased  
24 workload.  
25 The second thing though is filling that

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1 position would have been a reasonable accommodation to  
2 her to her continuing deteriorating vision.  
3 Q. Thank you. Did you also make physical, I guess,  
4 building accommodations for the HR administrative  
5 assistant? Was there a special buildout done for this  
6 particular employee?  
7 A. There was a -- we were moving forward with filling that  
8 position and we were looking -- we did some changes in  
9 the layout of HR. So it made sense when we were  
10 planning that to accommodate that position.  
11 Q. During your 19 years of leadership at the Road  
12 Commission, was HR ever placed under finance or was that  
13 ever a combined department?  
14 A. To my recollection, the HR director worked directly for  
15 me the entire time I was there.  
16 Q. Mr. Daly, you stated earlier that you hired Ms. Poplar.  
17 Do you remember her credentials, or her experience, why  
18 you specifically thought she was the most qualified for  
19 the position?  
20 A. I remember that she had extensive experience in HR  
21 previously with the City of Flint. She had also, I  
22 believe, managed a non-profit at some point. She was  
23 very familiar with the Flint operating environment. To  
24 me, that was also an important factor.  
25 Q. During your time that you worked with Ms. Poplar, what

1 was -- were you satisfied with her work?  
2 A. Yes, very much so.  
3 Q. What was your relationship like with her?  
4 A. We had a professional relationship and it was certainly  
5 amicable. She brought me ideas. I wasn't able to  
6 obviously approve all of them, but if we had resources  
7 to say do it, to implement that idea. She did make some  
8 changes on her own almost right away that I thought were  
9 very appropriate.  
10 At one point, I did a tentative reorganization  
11 in which she supervised the director of purchasing for a  
12 period of time. I believe that was the relationship  
13 when I left. But the director still reported to me. I  
14 would say that we had a good working relationship.  
15 Q. What about her demeanor, as an HR director, and her  
16 relationship with other employees during the time that  
17 you worked with Ms. Poplar, would you say that she was a  
18 fair and impartial HR director?  
19 A. I believe that to be true. The reason I do is because I  
20 never had a complaint about her from either the -- from  
21 other department heads or from an employee. So I would  
22 believe that her working relationship with them was as a  
23 professional one.  
24 Q. During the time that you were in leadership at the  
25 Genesee County Road Commission, you did work with and

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1 supervise Fred Peivandi, correct?  
2 A. I worked with him and I coordinated the supervision of  
3 Fred. One of the things that makes the position of  
4 county highway engineer different than all the rest of  
5 the department heads is, by statute, that position is  
6 appointed by the board rather than the manager director.  
7 Fred worked in that capacity, worked for the  
8 board, and we had a relationship in which we coordinated  
9 things. I handled the administrative side and he  
10 handled the engineer side.  
11 Q. While you were in leadership at the Road Commission, did  
12 you ever receive complaints about Mr. Peivandi, while  
13 you were there, about his working relationship with  
14 others?  
15 A. I did.  
16 Q. Do you remember the basis of those complaints?  
17 A. The basis of those complaints were that he was being  
18 unreasonable and unfair with some of his requirements.  
19 Q. Thank you, Mr. Daly.  
20 If you don't mind, now I'd like to take a  
21 brief five- or ten-minute break. It's 9:02. If we  
22 could come back at 9:12. And then if I have any  
23 additional questions, I will ask at that time. If not,  
24 I'll allow Mr. Cascini, the Road Commission's attorney  
25 to ask you some questions, okay?

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1 A. Okay.

2 (A short recess was taken)

3 BY MS. LEE:

4 Q. Thank you, Mr. Daly, for allowing me to take that quick  
5 break. We are back on the record now. I do have just a  
6 few more questions that I want to ask you before I turn  
7 it over to Attorney Cascini to ask you a few questions.

8 I wanted to go back to your testimony where  
9 you mentioned that Ms. Poplar did bring changes to you  
10 and ideas to you. You stated before that you were  
11 unable to implement them all. I'd like to ask you how  
12 did Ms. Poplar respond when you couldn't maybe implement  
13 a recommendation or did not take her advice on a  
14 particular matter?

15 A. She received it in a professional manner. One of the  
16 things that I enjoyed about working with Ms. Poplar, if  
17 we did get into something when she brought it to me and  
18 I wasn't able to implement it, she would even go back  
19 and take another look and say can we do it a little bit  
20 differently. Can we move something different so we can  
21 accomplish this.

22 On one occasion where we were looking at some  
23 reporting that HR was having to do, initially the way  
24 she suggested we couldn't do, she went back -- and I  
25 told her that. She went back on her own initiative and

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1 repackaged it. Came back to me and it was a more  
2 efficient process and we were able to implement it. I  
3 never -- her response, whenever I had to deny her  
4 request, was simply one of professionalism. She  
5 understood the funds were limited.

6 Q. Okay. So you never -- so you saw, even in your  
7 response, that you couldn't to something, you saw that  
8 she took initiative at times to see if she could assist  
9 the Road Commission?

10 A. Absolutely.

11 Q. Okay. Then did you ever experience, while you were the  
12 managing director, a power struggle with Ms. Poplar in  
13 the sense that she felt that her recommendations, or  
14 suggestions, should be that most importance?

15 A. No.

16 Q. Okay. During the time that you all worked together,  
17 Ms. Poplar was respectful to you?

18 A. Yes, she was.

19 Q. And did she ever leverage her position as the HR  
20 director against you as the managing director before the  
21 board or any other employees?

22 A. No.

23 Q. Did Ms. Poplar accept your authority as managing  
24 director?

25 A. From my perspective, absolutely.

1 Q. Did Ms. Poplar follow the directives that you gave her?

2 A. Yes.

3 Q. Was Ms. Poplar ever insubordinate under your leadership  
4 at --

5 A. No.

6 Q. Okay. Thank you so much, Mr. Daly. I appreciate your  
7 time today. And now I'll allow Attorney Cascini to ask  
8 you some questions if he wishes to do so.

9 MR. CASCINI: Thank you, Charis.

10 EXAMINATION

11 BY MR. CASCINI:

12 Q. John, I don't think I need to introduce myself. My name  
13 is Andrew Cascini. I'm representing the defendants in  
14 this particular lawsuit, including the defendant the  
15 Genesee Road Commission. I do have some questions I  
16 would like to ask you. If you have any trouble hearing  
17 me, at any point in time, or if you don't understand the  
18 question, please interrupt me and tell me. I won't hold  
19 it personally. I promise.

20 A. Okay.

21 Q. I'd like to talk a little bit about the vacant position  
22 in HR that you referred to earlier. You mentioned that  
23 at some point during your tenure as managing director  
24 there was a position in the HR department that was being  
25 held vacant and non-budgeted; is that correct?

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1 A. That is correct.

2 Q. Describe the circumstances upon which that position  
3 became vacant and it was held as non-budgeted.

4 A. The position was filled when I came into the Road  
5 Commission in December of '99. As I recall, the  
6 incumbent, at that time, had been in there for at least  
7 a year or two. She had been a long-term employee, but  
8 had moved into that position previous to my arrival.

9 About a year after I got there, she elected to  
10 retire. By this time, it's about 2002, 2003, I could  
11 see that we were going to have a problem ahead  
12 economically not just with the HR, but with the road  
13 commission funding generally. Just because of the way  
14 the committee was going, I put a hiring freeze on. That  
15 hiring freeze stayed on for about six or seven years.

16 The position after that was subsequently never  
17 filled. We wouldn't have filled it. The driving force,  
18 from my perspective, was the increased workload that was  
19 being mandated by the State with regards to OPED,  
20 medical care for current employees. And those  
21 requirements were what were driving, taking a really  
22 good look at that position. That was the reason,  
23 frankly, that when I was serving as the HR director, I  
24 really saw there was a need to fill that and provide  
25 more administrative support for the director of HR.



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1 a period of about three really solidified that we needed  
2 an addition.

3 Q. To take that analogy forward, you made the decision  
4 prior to Donna being there, but then the plan about what  
5 the job would entail exactly took shape during Donna's  
6 tenure?

7 A. That's correct. That's a good assessment.

8 Q. Got it. So you did mention that when Donna Poplar was  
9 first hired, during the interview process, Donna Poplar  
10 disclosed to you that she had a vision disability,  
11 right?

12 A. That is correct.

13 Q. And she asked for accommodation and that was the parking  
14 spot situation that you had described earlier?

15 A. Yes.

16 Q. She had had trouble parking far away from the building  
17 and wanted to park closer in order to make sure that she  
18 was able to see the path between her parking spot and  
19 the building?

20 A. She wanted to park closer.

21 Q. Sorry. Maybe I misstated that. She wanted to park  
22 closer to the path between her parking spot and the  
23 building, was closer?

24 A. Yes.

25 Q. I understand. After she began in her position, you

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1 mentioned that she began to ask for the creation of the  
2 HR administrative position; is that correct?

3 A. That is correct.

4 Q. Approximately how long after she was hired did she begin  
5 to ask for the creation of that HR administrative  
6 assistant position?

7 A. I would say approximately six months. I mean, one of  
8 the things that I thought was interesting was I had not  
9 shared with Donna -- I did not share with Donna my  
10 conclusion about that position that I wanted with the  
11 new HR director coming on board. I wanted to let her  
12 find her way about what she thought.

13 Q. So she, after being in the job for a few months, came to  
14 you and said I think that I need an HR administrative  
15 person. You already testified, sir, that you made the  
16 prior determination that an HR administrative person was  
17 necessary. So you were thinking that those two  
18 suggestions were beginning to harmonize; is that right?

19 A. Right. I wanted to wait until I had somebody. My  
20 experience in HR was limited to that period of time when  
21 I was serving as interim director. I wanted to let  
22 someone who had a great deal of HR experience see the  
23 situation and reach their own conclusions.

24 Q. I see. When Donna shared, for you, those reasons that  
25 she believed an HR administrative assistant position

1 should be created, we are talking about six months after  
2 she hired when she first brought it up to you. What  
3 were the reasons, as you best recall them, that she  
4 explained she thought that position was necessary?

5 A. Her principal reasons were the ones I had eluded to was  
6 to make the department more efficient and to better make  
7 us more responsive to the deadlines that the State was  
8 imposing on this, both with regards to record keeping  
9 and with regards to reporting to the State what we were  
10 doing.

11 Q. Okay. Now when did your time with the Road Commission  
12 end approximately?

13 A. My physical time with the Road Commission ended in  
14 November of '17. I was on administrative leave until  
15 April of '18.

16 Q. Okay. So just for purpose of timeline, Donna Poplar  
17 gets hired late 2016. She raises the issue of needing  
18 HR administrative assistant, you said, about six months  
19 later. So we are talking kind of early to mid 2017. By  
20 November of that year, that's when your, I would say,  
21 physical attendance at the job ends. Is that an  
22 appropriate timeline in all three phases?

23 A. That's an appropriate timeframe.

24 Q. You said -- you mentioned that when she first brings up  
25 the issue of the HR administrative assistant position

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1 being created, that she is doing it for reasons of  
2 operational efficiency. In fact, the same reasons that  
3 you kind of come to the conclusion we need another  
4 person back in here?

5 A. That's correct.

6 Q. You also mentioned, during your direct examination  
7 testimony, however, that eventually there come to be  
8 some discussions about more the role of that position,  
9 how it's used to accommodate her visual disability or  
10 that it could help her with her visual disability; is  
11 that right?

12 A. That's correct.

13 Q. Approximately when -- we have just laid out a rough  
14 timeline. When did those reasons come into play from  
15 Donna about the creation of the position?

16 A. I'd say they came in probably about 30 to 45 days after  
17 she suggested it.

18 Q. Okay. So it's -- at first it's the operational  
19 efficiency. And then about a month, possibly month and  
20 a half later she starts saying also this could be used  
21 to accommodate the visual disability?

22 A. As I recall, that's a fair assessment of the timeframe.

23 Q. Okay. Did she ever, at any point in time, tell you that  
24 she needed this person or needed a position that was  
25 exclusively and solely devoted to assisting her with her



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1 visual disability?

2 A. No.

3 Q. In fact, you had envisioned that the position that we  
4 are talking about here, the HR administrative position,  
5 you thought that was a necessary position before you  
6 even knew that you were going to have an HR director who  
7 happened to have visual disabilities, right?

8 A. That is correct.

9 Q. During your tenure, was the HR Administrative Assistant  
10 position ever actually created?

11 A. We relied on the position description.

12 Q. You relied on the position description that had existed  
13 from back when it was being held vacant; is that right?

14 A. Correct.

15 Q. Okay. Was the position a part-time or a full-time  
16 position when you decided to re-budget it?

17 A. When we decided to -- when we decided to re-budget it --  
18 let me back up.

19 The position, when I first got here as it had  
20 unfolded, was a full-time position. Because of the cost  
21 constraints and because of the fact that it had been so  
22 long since the position had been filled, I looked -- my  
23 first take was a part-time position at a part-time level  
24 and then see how that transpired vis-a-vis the  
25 efficiency of the department.

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1 Q. Okay. So eventually during your tenure, so I'm only  
2 asking for that period of time because afterward, after  
3 you leave, then there is a change in leadership over  
4 there. But during your tenure, did that administrative  
5 position become budgeted?

6 A. No.

7 Q. Okay. Was there a proposal for it to be budgeted?

8 A. No.

9 Q. So you and Donna had independently come up with the idea  
10 that you needed to budget a position. Had you remained  
11 in place as managing director -- I'm asking you a  
12 hypothetical question now.

13 Did you have the intent in the plan to budget  
14 that position in the future?

15 A. I actually had the intent to budget that position when I  
16 left. Remember, I left in November of '17. Our fiscal  
17 year starts first of October, so my intent had been to  
18 budget. But in the confusion that was surrounding  
19 around the Road Commission, that didn't make it into the  
20 budget. My intent had been had I stayed, I would have  
21 budgeted that position.

22 Q. Would you have budgeted that position in October of 2017  
23 or at the next available opportunity as a part-time or a  
24 full-time position?

25 A. I would have budgeted it as a part-time position.

1 Q. Little bit earlier you provided some testimony about a  
2 buildout that happened in the HR department; is that  
3 right?

4 A. Right.

5 Q. Pardon my ignorance, buildout, what are we talking  
6 about; are we talking about an expansion of physical  
7 premises?

8 A. No, no. It was, I guess, a restructuring of the  
9 existing space allocation.

10 Q. Okay. When you say space allocation, I'm not trying to  
11 belabor the point. The actual physical space where the  
12 HR people work, the office space?

13 A. Right. It was at the time that (inaudible) fall under  
14 HR. There was -- the purchasing was located immediately  
15 next door to HR. And as I recall, the "buildout" was  
16 removal of a wall between HR and purchasing as well as  
17 opening up some the spaces for access -- for employee  
18 access during the A2 to get into HR.

19 Q. The testimony that I have here, and this is my writing.  
20 Please do not let me put words in your mouth. My  
21 recollection of your testimony was that some of those  
22 buildout changes were done to "accommodate that  
23 position". I believe that you were referring to the HR  
24 Administrative Assistant position. Is that accurate?

25 A. Yes.

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1 Q. When you say accommodate that position, do you mean to  
2 make a physical space for the HR Administrative  
3 Assistant?

4 A. Yes.

5 Q. You're not saying that the buildout was performed in  
6 order to accommodate Donna Poplar's visual disability?

7 A. No.

8 Q. Understood. Okay. You mentioned that -- well, strike  
9 that.

10 You served as managing director since 1999.

11 So you were with the Genesee County Road Commission for  
12 a long time, right?

13 A. Almost 19 years.

14 Q. Almost 19 years. In fact, the during that period of  
15 time, Mr. Peivandi, the current managing director and  
16 then the director of engineering, was he there during  
17 that entire time?

18 A. Yes.

19 Q. So you worked with Fred from 1999 to 2018, right?

20 A. No. Okay.

21 Q. Okay. If you could clarify, what were the periods where  
22 that did not overlap?

23 A. Fred -- well, Fred when I got there, Fred was not the  
24 county highway engineer.

25 Q. Okay.

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1 A. But became the county highway engineer like, I want to  
2 say, '14 or '15. That was the point at which I started  
3 working with him directly.  
4 Q. Prior to him becoming the county highway engineer, he  
5 was internally within the administration, within the  
6 engineering department however; is that right?  
7 A. Yes, that is correct.  
8 Q. So I know how the statute works. But let's talk about  
9 it for a second. We have got this position that is  
10 required by statute for there to be county highway  
11 engineer that the board has the sole authority and  
12 discretion to appoint, right?  
13 A. Yes, that is correct.  
14 Q. Position that needs to be filled. Statute makes it  
15 happen?  
16 A. Yes.  
17 Q. Separately however, you have an administration where you  
18 have got engineer employees within the GCRC, right?  
19 A. Yes.  
20 Q. So the two maybe co-term or co-extensive, they may exist  
21 to be the same person. They could be, in theory, two  
22 different people. You could do it 100 ways under the  
23 sun, right?  
24 A. There are many different ways to implement that.  
25 Q. Okay. Fred had been continuously employed in the

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1 engineering department since 1999, right?  
2 A. Yes.  
3 Q. Across that 18-year period, did you come to know Fred  
4 professionally?  
5 A. Yes.  
6 Q. Would you say you knew him pretty well? 18 years is a  
7 long time to work with someone.  
8 A. I think first, I would say that Fred is an exceptional  
9 engineer. Probably one of the best engineers I have  
10 ever worked with.  
11 Q. During that period of time, did you ever see anything,  
12 hear anything or have anything that generated the  
13 opinion that Fred either had a problem with or held  
14 animus towards African Americans, their race, I should  
15 say? Not particular people, but African Americans as a  
16 race.  
17 A. I had a complaint -- Oh Lord, it would have to have been  
18 like 2010, 2012, something somewhere in that timeframe,  
19 the early part of the decade from Kim Day who had been  
20 an engineering inspector about how she felt that she was  
21 at the "end of her career". And the reason she couldn't  
22 get promoted was because of the fact -- one of the  
23 factors that she felt she couldn't get promoted was that  
24 she was an African American.  
25 Q. Is Kim Day still an employee, to the best of your

1 knowledge, with the Road Commission?  
2 A. She is.  
3 Q. And is she currently a supervisor with the Road  
4 Commission in the engineering department, to the best of  
5 your knowledge?  
6 A. No, she is not.  
7 Q. She is not supervisor in the engineering department?  
8 A. No.  
9 Q. What position, to your best of your knowledge, does she  
10 occupy within the engineering department?  
11 A. I don't believe she holds a position within the  
12 engineering department.  
13 Q. You caught me. You're right. I meant to say  
14 maintenance department. Perhaps my brain isn't firing  
15 correctly.  
16 Is she currently, to the best of your  
17 knowledge, a supervisor in the maintenance department?  
18 My apologies, Mr. Daly.  
19 A. No problem. Yes, she is.  
20 Q. Okay. Did you ever come to observe any instances  
21 personally or see any examples where you believed that  
22 Mr. Peivandi was animus towards African Americans  
23 because of their race?  
24 A. I did not.  
25 Q. You mentioned, at one point in time, that you and Donna

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1 Poplar worked together on a tentative re-organization of  
2 the Road Commission. You said something about there  
3 being a change in supervision of the Department of  
4 Purchasing; is that right?  
5 A. That is correct.  
6 Q. Can you describe, for me, a little bit about what that  
7 tentative re-organization entailed?  
8 A. It entailed looking at -- purchasing had previously  
9 worked under finance. There were difficulties  
10 communicating with, then, Finance Director Melissa  
11 Williams. That was the name I couldn't remember early  
12 on in the position. Melissa Williams, the finance  
13 director with the purchase coordinator. I did not feel  
14 it appropriate to move the purchasing coordinator to  
15 where they were working under my supervision because  
16 that would have made them a de facto department head.  
17 So I looked if that was right at the time that  
18 Donna was coming as HR director. So I made a little --  
19 since they were -- purchasing and HR were literally  
20 within about eight feet of each other physically, I  
21 re-assigned that function to HR.  
22 Q. It had been, prior to, under finance and then you  
23 decided to move it to HR at that point in time?  
24 A. Correct.  
25 Q. Okay. John, I have taken up enough of your time here.

